

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

KATHLEEN MILLER,
Plaintiff

v.

VERIZON COMMUNICATIONS, INC.,
Defendant

Civil Action No.: 05-30117-KPN

PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS

Question 1:

Do you or does anyone you know work for the Defendant? If so, please state the relationship in as much detail as possible.

Question 2:

Do you have any bias in favor of management or corporations?

Question 3:

Do you work for management or does any relation of yours work for management, and, if so, does this fact in any way affect your ability to be an impartial juror in this case?

Question 4:

Do you, or does anyone in your family, work for management in a corporation? If so, what is the position that you or they hold and for which corporation do they work?

Question 5:

Where are you employed and in what position?

Question 6:

Do you have any bias against employees who claim handicap discrimination?

Question 7:

Do you have any bias against employees who claim retaliation for resisting discrimination?

Respectfully submitted,

The Plaintiff
KATHLEEN MILLER
By Her Attorney

/s/ Michael O. Shea
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Date: March 20, 2007

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the EDF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on March 20, 2007, and that there are no non-registered participants.

/s/ Michael O. Shea